DISCUSSION QUESTIONS

POWER GENERATOR / UTILITY / NATURAL GAS SECTOR
PROTOCOL WORKSHOP ON SEPTEMBER 9, 2004
AT THE CALIFORNIA ENERGY COMMISSION

Provided below are questions to help focus public discussion, comment, and suggestions in review of the draft Power Generator / Utility / Natural Gas Sector Reporting and Certification Protocols. Interested parties are encouraged to comment on any aspect of the draft industry-specific greenhouse gas (GHG) emissions inventory protocols.

General

1. Are the protocols written clearly and sections provided in logical order? Are the descriptions of eligible power/utility/natural gas sector entities clear?

2. Registry members in this sector currently report to various local, state, and federal agencies – do the draft protocols appropriately utilize existing reporting requirements faced by these members? Which existing reporting requirements provide information or data of sufficient accuracy, completeness, consistency, and transparency for reporting and certification of entity-wide GHG emission inventories?

3. Are critical portions or explanations of entity-wide GHG emissions inventories using these industry-specific protocols missing or incomplete?

4. Are the proposed protocols consistent with the existing General Reporting and Certification protocols of the Registry?

5. Will the draft reporting protocol provide sufficient transparency of reported emissions for power generators, utilities, and natural gas entities?

6. Recognizing unique characteristics of electricity, should inventories be designed at the power pool or regional level, rather than California, U.S., or international boundaries?

Reporting

1. *Eligibility* - Are the North American Industry Classification System (NAICS) codes appropriate to describe entities that will be required to report utilizing these draft protocols? If not, can you recommend alternative approaches to define eligible members within this sector?

2. Are key terms appropriately defined within the power generator / utility / natural gas sector protocols? Are important terms missing that should be clearly defined in these protocols?

3. *Scope of GHGs to Report* - Are the emissions inventory reporting requirements clear (e.g., California-only versus U.S. inventory, direct emissions, indirect emissions)?

4. Are the efficiency or output-based metrics clearly described and the information or data requirements transparent?

5. Are there any metrics that you would modify, add, or delete from the protocols?

6. Should the efficiency metrics focus on all or certain direct emission sources (including out-of-state owned or controlled generation that is consumed in California) and all or certain indirect sources (e.g., purchased electricity) of emissions in reporting GHGs per net MWh generated or delivered?

Quantification Methodologies

1. Are the proposed emission quantification methods for *direct stationary combustion* clear and appropriate? If not, how can this part of the protocol be improved?

2. Should quantification methods focus on fuel-based records, continuous emissions monitoring, or some combination of both sources of data to establish annual emissions?

3. Are the proposed methods to quantify *fugitive emissions* from natural gas transmission, storage, and distribution clear and appropriate? If not, how can these parts of the protocols be improved?

4. Is additional guidance on fugitive emissions from pipelines with geographic boundaries needed? Should a separate chapter be drafted on reporting California-only GHG emissions?

5. Are the proposed emission quantification methods for direct *process emissions* clear and appropriate? Are any process emissions missing that should be included in these protocols?

6. Do you agree with the approach used to account for emissions associated with *electricity transmission and distribution* losses? Can you suggest other approaches to estimate greenhouse gas emissions resulting from these sources?

7. Is the method proposed to determine emissions associated with *purchased power for resale to end users* appropriate? If not, how can it be improved?

8. Can you identify additional reference or guidance documents that might be appropriate to include in the protocols? For instance, additional sources of information to better quantify emissions from specific types of members (e.g., municipal, investor-owned, merchant generators) or specific types of sources (e.g., process emissions)?

9. What are your views about the proposed approach to reporting of biomass greenhouse gas emissions?

Certification

1. Are there existing audit or certification schedules within this industry sector that the proposed protocols should take into account?

2. Do the protocols provide the correct sequence of certification activities and related questions and are these activities appropriate and sufficient for greenhouse gas inventories within these sectors?

3. Can you identify any "best practices" or additional detail that might improve the guidance to certifiers of emission inventories using the draft protocols?

4. Do the protocols promote asking the right questions and call for sufficient documentation regarding certification of a transparent entity wide (California or United States boundary) greenhouse gas emissions inventory? Do you have suggestions on how to improve or promote a more consistent certification process for the power generation / utility / natural gas member emission inventory?